

# Exhibit E

AVANTI LAW GROUP, PLLC  
ATTORNEYS AT LAW

Marisol Saucedo <mсаucedo@avantilaw.com>

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## Contact with Plaintiff and Putative Class

1 message

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**Robert Anthony Alvarez** <ralvarez@avantilaw.com>

Fri, Aug 10, 2018 at 2:00 PM

To: Eric Matwiejczyk <ericm@duffchadwickpc.com>

Cc: Agustin Henriquez <ahenriquez@avantilaw.com>, Marisol Saucedo <mсаucedo@avantilaw.com>, Madison Linton <mlinton@avantilaw.com>

Eric,

It has come to my attention that your clients are attempting to contact my clients and members of the class and making false statements in an attempt to obtain settlement from them outside of this litigation. I will be preparing a motion for an order to prevent such contact, for corrective notice to be sent to all class members and for sanctions due to the false statements being made. I would request that your client cease and desist from such contact either directly or through his family members. I assume you will be opposing such motion and will indicate such unless I hear from you by Monday at noon that you will concur.

Kindest Regards,

Robert

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**Threats to Potential Class Members**

2 messages

**Robert Anthony Alvarez** <ralvarez@avantilaw.com>

Sun, Aug 19, 2018 at 8:19 PM

To: Eric Matwiejczyk &lt;ericm@duffchadwickpc.com&gt;

Cc: Agustin Henríquez &lt;ahenriquez@avantilaw.com&gt;, Marisol Saucedo &lt;mсаucedo@avantilaw.com&gt;, Madison Linton &lt;mlinton@avantilaw.com&gt;

Eric,

I got some more information that now it's Mandy who had made threats and or threatening comments to and about potential class members. She has stated that anyone who joins the case will have bad things happen to them and had caused at least one potential class member that had indicated they would be joining the case to back off. This is obviously a big problem and though you had indicated that you took care of the last inappropriate communication between your clients and one of the opt ins, this new information cannot be ignored or overlooked. I will have to seek court intervention and will request an evidentiary hearing to seek a protective order and for corrective notice be issued to all potential class members. I again ask that you speak with your clients about these issues and let know whether you will stipulate to a protective order and corrective notice or if you will be opposing my motion so I can indicate such per local rule regarding concurrence.

Robert

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**Robert Anthony Alvarez** <ralvarez@avantilaw.com>

Mon, Aug 27, 2018 at 3:26 PM

To: Eric Matwiejczyk &lt;ericm@duffchadwickpc.com&gt;

Cc: Agustin Henríquez &lt;ahenriquez@avantilaw.com&gt;, Marisol Saucedo &lt;mсаucedo@avantilaw.com&gt;, Madison Linton &lt;mlinton@avantilaw.com&gt;

Eric,

I never heard back from you on this and so I'll be filing a Motion for Protective Order, Sanctions and Corrective Notice today. I will note that your clients do not concur.

Robert

[Quoted text hidden]

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**Robert Anthony Alvarez**

Founding Member , Avanti Law Group PLLC

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